

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re

Lordstown Motors Corp., *et al.*,¹

Debtors.

Chapter 11

Case No. 23-10831 (MFW)

(Jointly Administered)

Re: D.I. 131 & 259

**CERTIFICATION OF COUNSEL REGARDING ORDER
APPROVING STIPULATION EXTENDING REPLY DEADLINE**

The undersigned counsel to Hon Hai Precision Industry Co., Ltd. (a/k/a Hon Hai Technology Group), Foxconn EV Technology, Inc., and Foxconn EV System LLC (collectively, the “Movants” or “Foxconn”)² hereby certifies as follows:

1. On July 20, 2023, Foxconn filed the *Motion of Hon Hai Precision Industry Co., Ltd. (a/k/a Hon Hai Technology Group), Foxconn EV Technology, Inc., and Foxconn EV System LLC to Dismiss, or, in the Alternative, Convert the Bankruptcy Cases* (D.I. 131) (the “Motion”), seeking the dismissal of the chapter 11 cases of the Debtors for cause, or, in the alternative, converting the chapter 11 cases to cases under chapter 7 of the Bankruptcy Code in the United States Bankruptcy Court for the District of Delaware (the “Court”).

¹ The debtors and the last four digits of their respective taxpayer identification numbers are: Lordstown Motors Corp. (3239); Lordstown EV Corporation (2250); and Lordstown EV Sales LLC (9101) (collectively, the “Debtors”). The Debtors’ service address is 27000 Hills Tech Ct., Farmington Hills, MI 48331.

² The Movants are limited to those entities named in the Debtors’ Adversary Complaint that are subject to the jurisdiction of this Court. At the appropriate time and if necessary, Foxconn will seek relief for those entities that are without the Court’s jurisdiction.

2. At the hearing on August 15, 2023, the Court scheduled the Motion to go forward on August 28, 2023, at 10:30 a.m. (ET).

3. Under rule 9006-1 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware, the deadline for Foxconn to file a reply (the “Reply Deadline”) would be August 23, 2023, at 4:00 p.m. (ET). The Debtors and Foxconn have agreed to extend the Reply Deadline to August 25, 2023, at 4:00 p.m. (ET), as set forth in the proposed form of order attached as **Exhibit A** (the “Proposed Order”) and the stipulation (the “Stipulation”) attached thereto as Exhibit 1.

WHEREFORE, Foxconn respectfully requests that the Court enter the Proposed Order attached hereto as **Exhibit A** approving the Stipulation.

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Dated: August 18, 2023
Wilmington, Delaware

**MORRIS, NICHOLS, ARSHT & TUNNELL
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